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DEFECTS INVESTIGATION RECALL MGMT DIV.

HONDA

American Honda Motor Co., Inc.

1919 Torrance Boulevard Torrance, CA 90501-2746 Phone (310) 783-2000

October 31, 2007

Mr. Daniel C. Smith
Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, DC 20590

07V-512 (4 pages)

Dear Mr. Smith:

As a result of a vehicle fire caused by arson, Honda has agreed to conduct a voluntary product update campaign on Honda Civic GX compressed natural gas (CNG) models. While all Civic GX models meet or exceed the requirements of all relevant Federal Motor Vehicle Safety Standards, we recognize that in the event of arson, CNG tanks may experience a sudden and unexpected rupture of the tank that could present an unfamiliar condition to emergency responders. To help prevent injury or danger to emergency responders, Honda has agreed to conduct this voluntary campaign in accordance with the requirements of 49 CFR Part 573 Defect and Noncompliance Reporting, though we do not consider this activity related to either a defect or noncompliance.

573.6(c)(1)

Name of manufacturer: Honda of America Manufacturing, Inc. (HAM)

Manufacturer's agent: William R. Willen

American Honda Motor Co., Inc. (AHM)

1919 Torrance Blvd.

Torrance, CA 90501-2746

573.6(c)(2)

Identification of potentially affected vehicles:

Make/Model	<u>Description</u>	VIN Range/Dates of Manufacture
Honda Civic GX	1998 model year	1HGEN1***WL000001 – 1HGEN1***WL000542 Apr. 29, 1997 to May. 28, 1998
Honda Civic GX	1999 model year	1HGEN1***XL000001 - 1HGEN1***XL000666 Aug. 27, 1998 to May. 17, 1999
Honda Civic GX	2000 model year	1HGEN1***YL000001 1HGEN1***YL000720 Feb. 16, 2000 to Jul. 26, 2000
Honda Civic GX	2001 model year	1HGEN2***1L000004 1HGEN2***1L000803 Jul. 27, 2000 to Jul. 26, 2001
Honda Civic GX	2002 model year	1HGEN2***2L000001 – 1HGEN2***2L000721 Jun. 21, 2001 to Jul. 18, 2002

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Honda Civic GX	2003 model year	1HGEN2***3L000001 – 1HGEN2***3L000452 May 21, 2002 to Aug. 8, 2003
Honda Civic GX	2004 model year	1HGEN2***4L000001 – 1HGEN2***4L000786 Apr. 30, 2003 to Aug. 19, 2004
Honda Civic GX	2005 model year	1HGEN2***5L000001 – 1HGEN2***5L000600 Oct. 6, 2004 to Jul. 27, 2005
Honda Civic GX	2006 model year	1HGFA4***6L000005 - 1HGFA4***6L000356 Oct. 5, 2005 to Sep. 1, 2006
Honda Civic GX	2007 model year	1HGFA4***7L000001 – 1HGFA4***7L001021 Aug. 8, 2006 to Aug. 8, 2007

Description of the basis for the determination of the campaign population:

The campaign population was based on manufacturing records and market occurrence situation. The VIN range reflects all possible vehicles that could potentially experience the problem.

573.6(c)(3)

Total number of potentially affected vehicles:

6,545

573.6(c)(4)

Percentage of affected vehicles that contain the defect: Unknown

573.6(c)(5)

Description:

After analysis and recreation testing, we have determined that a single incident of fire in a Honda Civic GX compressed natural gas (CNG) was caused by arson. Our testing indicated conclusively that the use of an accelerant was required to ignite and sustain fire in the rear seat of a Civic GX to the point of exceeding the ability of the fire retardant materials used throughout the cabin. The incident in question eventually resulted in a rupture of the CNG tank, likely due to uneven heating of the tank, which may have prevented the pressure relief device from venting the tank as designed.

Under similar conditions, it is possible that a tank could rupture suddenly, instantly increasing the scale of the fire and potentially ejecting the tank from the vehicle. Every component of the vehicle, including the tank and pressure relief device, meet the requirements of FMVSS 304, Compressed Natural Gas Fuel System Integrity. Our testing has indicated that the conditions described above require the presence of an accelerant, such as gasoline, to overcome the fire resisting capacity of the interior materials of a Civic GX, allowing the fire to spread to the CNG tank. Despite the necessity for a harmful and criminal act to cause these conditions, we have chosen to voluntarily conduct a product update campaign to address this situation.

573.6(c)(6)

Chronology:

Mar. 26, 2007	AHM received 1 st and only complaint from one of the fleet managers for the City of Seattle that an explosion occurred in fleet's parking lot, and Honda initiated an investigation.
Apr. 11, 2007	Honda visited the parking lot in the City of Seattle and checked the vehicle condition of this arson case.
Apr. 16, 2007	AHM informed ODI of this incident by phone.
May 9, 2007	AHM received a report from fire department of the City of Seattle.
Jul. 5, 2007	AHM received an inquiry letter PE07-028 from ODI.
Jul. 10, 2007	Honda completed an investigation and had a meeting with ODI to explain the results of the investigation and analysis.
Aug. 15, 2007	AHM submitted a partial response for PE07-028 to ODI.
Sep. 3, 2007	AHM submitted a final response for PE07-028 to ODI.

573.6(c)(8)(i)

Program for remedying:

The owners of all affected vehicles will be contacted by mail and asked to take their vehicle to a Honda automobile dealer. The dealer will install a heat insulator material to the rear seat back, free of charge.

573.6(c)(8)(ii)

The estimated date to e-mail preliminary notification to dealers: Oct. 31, 2007

The estimated date to provide service bulletin to dealers: Nov. 16, 2007

The estimated date to begin sending notifications to owners: Nov. 26, 2007

The estimated date of completion of the notification: TBD

573.6(c)(9)

Representative copies of all notices, bulletins and other communications:

A copy of the dealer service bulletin and text of the final customer notification letter will be submitted to your office as soon as possible.

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573.6(c)(10)

Proposed owner notification letter submission:

A draft of the owner notification letter will be submitted to your office as soon as possible.

573.6(c)(11)

Manufacturer's campaign number: Q63

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

William R. Willen Managing Counsel

Product Regulatory Office

WRW:nis